

EXHIBIT 1

THIERRY GUETTA

Page 1

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN,)	
)	
Plaintiff,)	
)	Case No.
vs.)	CV10-0014-DDP (JCx)
)	
THIERRY GUETTA a/k/a)	
MR. BRAINWASH; and DOES 1)	
through 10, inclusive,)	
)	
Defendants.)	
_____)	

VIDEOTAPED DEPOSITION OF

THIERRY GUETTA

Monday, November 15, 2010

Reported by: Irene Nakamura,
C.S.R. No. 9478, RPR, CLR

THIERRY GUETTA

Page 5

1 I N D E X (continued):

2

3 E X H I B I T S

4 MARKED

PAGE:

5 1 FIRST AMENDED NOTICE OF TAKING 10
 6 DEPOSITION OF THIERRY GUETTA
 7 A/K/A MR. BRAINWASH AND
 8 REQUEST FOR PRODUCTION OF
 9 DOCUMENTS
 10 (18 pages)

11 2 OBJECTIONS TO FIRST AMENDED 10
 12 NOTICE OF TAKING DEPOSITION
 13 OF THIERRY GUETTA A/K/A
 14 MR. BRAINWASH AND REQUEST FOR
 15 PRODUCTION OF DOCUMENTS
 16 (29 pages)

17 3 INTERNET YOUTUBE DOCUMENTS 32
 18 ENTITLED CARSON DALY AT
 19 MR. BRAINWASH'S STUDIO PART 2
 20 (6 pages)

21 4 COPY OF RUN DMC OLD FAMILY 35
 22 PHOTOGRAPH; BATES NUMBER G-37
 23 (1 page)

24 5 COPY OF RUN DMC STENCIL AND 36
 25 GRAFFITI PHOTOGRAPHS; BATES
 NUMBERS G-39 and G-40
 (2 pages)

6 COPY OF RUN DMC PHOTOGRAPH 47
 NO BATES NUMBER
 (1 page)

7 COPY OF RUN DMC OLD CANVAS 81
 PHOTOGRAPH; BATES NUMBER G-41
 (4 pages)

8 COPY OF RUN DMC OLD FAMILY 96
 STACK OF PRINTS; NO BATES
 NUMBERS
 (3 pages)

25

THIERRY GUETTA

Page 6

1 I N D E X (continued):

2

3 E X H I B I T S

4 MARKED

PAGE:

5 9 INSIDE THE ROCK POSTER FRAME 113

6 MR. BRAINWASH RUN DMC PRINT
7 BACK FOR SALE DATED SATURDAY,
MAY 23, 2009; NO BATES NUMBERS
(19 pages)

8 10 HANDWRITTEN INVOICES 116

9 BATES NUMBERS G-9 THROUGH G-36
(28 pages)

10 11 TYPED INVOICE; BATES 120

11 NUMBER G-43
(1 page)

12 12 PHOTOGRAPHS OF RUN DMC RECORDS 126

13 WORK ON DISPLAY AT THE
14 LOS ANGELES SHOW; BATES NUMBER
G-39, AND NO BATES NUMBERS FOR
REMAINING THREE PAGES
(4 pages)

15 13 PHOTOGRAPHS OF RUN DMC 128

16 GRAFFITI; BATES NUMBER G-40,
17 AND NO BATES NUMBERS FOR
REMAINING THREE PAGES
(4 pages)

18 14 PHOTOGRAPHS OF RUN DMC 131

19 GRAFFITI WRAPPED IN PLASTIC
20 NO BATES NUMBERS
(2 pages)

21 15 INTERNET YOUTUBE DOCUMENTS 138

22 ENTITLED CARSON DALY AT
23 MR. BRAINWASH'S STUDIO PART 1
(4 pages)

24

25

THIERRY GUETTA

Page 7

1 I N D E X (continued):

2

3 E X H I B I T S

4 MARKED

PAGE:

5 16 PHOTOGRAPHS OF RUN DMC OLD 169

6 FAMILY PHOTO "MR. BRAINWASH

7 PRESENTS LIFE IS BEAUTIFUL;

8 NO BATES NUMBER ON FIRST PAGE;

9 BATES NUMBERS G-42 AND G-8

10 (3 pages)

11 17 RUN DMC OLD FAMILY PHOTO 183

12 SCREEN PRINT ON TEXTURED

13 ARCHIVAL PAPER. SIGNED AND

14 NUMBERED; NO BATES NUMBER

15 (1 page)

16

17

18

19

20

21

22

23

24

25

THIERRY GUETTA

Page 38

10:52:01 1 MR. GUTMAN: There's two pages of
10:52:02 2 Exhibit 5, G-39 and G-40. You have those in front
10:52:05 3 of you.

10:52:05 4 Question again, please.

10:52:06 5 BY MR. LINDE:

10:52:06 6 Q. Do you see the depiction of just Run DMC
10:52:10 7 is similar, do you see that?

10:52:12 8 MR. GUTMAN: Objection; vague, ambiguous,
10:52:14 9 calls for a legal conclusion.

10:52:15 10 THE DEPONENT: They're not the same.

10:52:19 11 BY MR. LINDE:

10:52:19 12 Q. I understand.

10:52:22 13 Do you know if those works were created
10:52:25 14 from a common source, such as a stencil?

10:52:29 15 A. One of them, yes. The other one, no.

10:52:32 16 Q. Okay. So the photograph marked G-40 was
10:52:39 17 created using stencil?

10:52:40 18 A. Yes.

10:52:40 19 Q. Was that a paper stencil?

10:52:44 20 A. I don't recall.

10:52:45 21 Q. Do you know -- do you recall who made the
10:52:47 22 stencil?

10:52:48 23 A. I did.

10:52:48 24 Q. You made it personally?

10:52:50 25 A. Yes.

THIERRY GUETTA

Page 44

10:58:21 1 It just happens.

10:58:23 2 Q. Do you feel like Run DMC were -- are
10:58:25 3 important artists?

10:58:26 4 A. Like a lot of other people.

10:58:30 5 Q. Okay.

10:58:31 6 A. You know.

10:58:31 7 Q. So you do feel that Run DMC are important
10:58:34 8 artists; correct?

10:58:35 9 A. I don't know.

10:58:36 10 Q. Okay. Do you feel -- at the time that you
10:58:40 11 made those works, did you feel that using the image
10:58:45 12 of Run DMC could help draw people to your show?

10:58:48 13 A. No.

10:58:50 14 Q. So that picture could have been of any rap
10:58:54 15 group; correct?

10:58:54 16 A. Yes.

10:58:56 17 MR. GUTMAN: Objection; hypothetical,
10:58:57 18 incomplete --

10:58:58 19 THE DEPONENT: Yes.

10:58:59 20 BY MR. LINDE:

10:59:05 21 Q. It could have just as easily been of --
10:59:08 22 actually, strike the question.

10:59:09 23 Before making the images that we have
10:59:25 24 attached as Exhibit 5, had you ever listened to the
10:59:28 25 music of Run DMC?

THIERRY GUETTA

Page 45

10:59:30 1 A. Yes, but I'm not -- I mean, I -- I know
10:59:42 2 one song that was mixed with a rock and roll, I
10:59:47 3 guess. I don't remember the name of the guy, but
10:59:53 4 that -- that mean -- I don't know about them. I
10:59:56 5 don't know the song about them. If you tell me one
10:59:59 6 song, this is this, I don't even know, you know.

11:00:01 7 It was just -- like I said, something will
11:00:04 8 happen in front of me and -- and it happens. It's
11:00:07 9 not like I love Run DMC or I'm a fan of Run DMC.
11:00:13 10 It just happened, you know.

11:00:14 11 Q. When you first saw that picture, did you
11:00:16 12 even know that was the group Run DMC?

11:00:18 13 A. Yes.

11:00:19 14 Q. Okay. So you had seen Run DMC before;
11:00:24 15 correct?

11:00:24 16 A. Oh, yeah, everywhere.

11:00:26 17 Q. Where --

11:00:26 18 A. I mean -- I mean, you see it. It -- it's
11:00:29 19 like -- it's like I believe it's person that at one
11:00:37 20 time of their life, they were everywhere. You
11:00:40 21 know, you see picture of them everywhere, you know,
11:00:42 22 like holding themselves.

11:00:43 23 They have the Adidas and the things and
11:00:48 24 holding -- you know, I mean, it's like -- kind of
11:00:50 25 like characters.

THIERRY GUETTA

Page 48

11:02:56 1 record, to reflect that the witness was putting
11:03:00 2 his hands in various positions to try and
11:03:03 3 recharacterize the -- the way that the individuals
11:03:07 4 in Run DMC were posing in this photograph and/or
11:03:12 5 other photographs.

11:03:18 6 BY MR. LINDE:

11:03:19 7 Q. Okay. Did you use the photograph, that's
11:03:30 8 attached in Exhibit 6, as the basis for your works
11:03:34 9 that we have attached as Exhibit 5?

11:03:36 10 A. Yes, I did.

11:03:40 11 Q. Okay. And so, in other words, you
11:03:42 12 incorporated the photograph, that we have attached
11:03:45 13 as Exhibit 6, into your works; correct?

11:03:48 14 A. Yes.

11:03:49 15 MR. GUTMAN: Objection; vague and
11:03:50 16 ambiguous.

11:03:50 17 You've got to pause for a moment --

11:03:52 18 THE DEPONENT: Okay.

11:03:52 19 MR. GUTMAN: -- so I can interpose my
11:03:53 20 objections.

11:03:54 21 THE DEPONENT: Okay.

11:03:54 22 BY MR. LINDE:

11:03:55 23 Q. And so when you saw the picture that we
11:03:57 24 have marked as Exhibit 6, you felt that picture was
11:04:02 25 visually appealing; correct?

THIERRY GUETTA

Page 52

11:07:11 1 Just went into my eyes, and -- and at that moment,
11:07:16 2 I was doing the old photos, you know, mix. And --
11:07:22 3 and it looked good in the family picture, kind of
11:07:25 4 way. So I -- I start -- I start knowing that it
11:07:33 5 could work with it. I could do something with that
11:07:37 6 photo, you know.

11:07:39 7 But it could have -- it could have done
11:07:41 8 another photo of Run DMC or another photo of Run
11:07:45 9 DMC, but it happened to be that one, you know.

11:07:48 10 There was so many of them, just, you know,
11:07:51 11 like you -- you choose, there is so many, and it
11:07:54 12 happened to be that one.

11:07:55 13 BY MR. LINDE:

11:08:06 14 Q. So your decision to incorporate the
11:08:08 15 Friedman Run DMC photograph into your works was not
11:08:11 16 based upon the way that the group members were
11:08:13 17 posed in this picture; correct?

11:08:15 18 A. No.

11:08:15 19 Q. And -- is that correct?

11:08:16 20 A. Yeah, that's correct.

11:08:17 21 Q. Okay.

11:08:17 22 A. I mean, that means, it's -- it's -- it's
11:08:20 23 not like -- like I said, I saw it. It just
11:08:23 24 happened to be that one, and that's it. I didn't
11:08:25 25 like made myself like this is the one that I want

THIERRY GUETTA

Page 65

11:20:16 1 A. I must have, but I don't recall.

11:20:18 2 MR. GUTMAN: Well, if you don't recall,

11:20:19 3 then say that.

11:20:20 4 THE DEPONENT: I don't recall.

11:20:21 5 MR. GUTMAN: Okay.

11:20:22 6 BY MR. LINDE:

11:20:31 7 Q. At some point in time, you cut out images

11:20:34 8 of two of the band members and pasted them onto a

11:20:38 9 image of an old family; is that right?

11:20:41 10 A. Yes.

11:20:41 11 Q. What -- how did you do that? With

11:20:43 12 Photoshop?

11:20:44 13 A. Yes. Photoshop.

11:21:04 14 MR. LINDE: Let's just go off the record

11:21:05 15 for a second.

11:21:07 16 THE VIDEOGRAPHER: Okay. Should we end

11:21:07 17 the tape since we only have a few minutes?

11:21:08 18 MR. LINDE: Might as well.

11:21:09 19 THE VIDEOGRAPHER: Okay. This is the end

11:21:11 20 of Tape 1 of the deposition of the Thierry Guetta.

11:21:17 21 We are going off the record, and the time is

11:21:19 22 approximately 11:21 a.m.

11:21:21 23 (Whereupon, a recess was held

11:21:22 24 from 11:21 a.m. to 11:27 a.m.)

11:22:28 25 ///

THIERRY GUETTA

Page 66

11:22:28 1 THE VIDEOGRAPHER: We are now going back

11:27:52 2 on the record, and the time is approximately

11:27:54 3 11:27 a.m.

11:27:56 4 BY MR. LINDE:

11:27:57 5 Q. All right. So looking at Exhibit No. 6,

11:28:00 6 which is the Friedman Run DMC photograph, you

11:28:10 7 incorporated that photograph into some of your

11:28:12 8 works; correct?

11:28:13 9 A. Yes.

11:28:13 10 MR. GUTMAN: Objection; asked and

11:28:14 11 answered.

11:28:14 12 You've got to pause after the question.

11:28:17 13 THE DEPONENT: Okay.

11:28:18 14 BY MR. LINDE:

11:28:18 15 Q. "Yes"?

11:28:18 16 A. Can you repeat the question, please.

11:28:22 17 Q. Sure.

11:28:22 18 You incorporated the Friedman Run DMC

11:28:25 19 photograph into some of your works; correct?

11:28:27 20 MR. GUTMAN: Asked and answered like 20

11:28:28 21 times now.

11:28:31 22 THE DEPONENT: Yes.

11:28:31 23 BY MR. LINDE:

11:28:32 24 Q. At all times that you were using that

11:28:34 25 photograph in your works, you knew that you didn't

THIERRY GUETTA

Page 67

11:28:37 1 take that photograph; correct?

11:28:38 2 A. Yes.

11:28:41 3 Q. And you knew that you didn't own that
11:28:44 4 photograph; correct?

11:28:45 5 A. Yes.

11:28:45 6 Q. Before using that photograph, what did you
11:28:47 7 do to check if it was under copyright?

11:28:50 8 A. I didn't check anything.

11:28:54 9 Q. What did you do to contact Run DMC?

11:28:57 10 A. Nothing.

11:28:59 11 Q. What did you do to contact Glen Friedman?

11:29:04 12 A. Nothing.

11:29:04 13 Q. What did you do to check with the
11:29:06 14 copyright office?

11:29:07 15 A. Nothing.

11:29:08 16 Q. Before you used that image, did the
11:29:13 17 thought ever cross your mind that maybe you should
11:29:16 18 pay somebody a license fee for using a photograph
11:29:19 19 that you knew that you didn't take?

11:29:21 20 A. I didn't know.

11:29:24 21 Q. Okay. So you believe that by downloading
11:29:27 22 that photograph on the Internet, you had the right
11:29:30 23 to reproduce that image; correct?

11:29:32 24 MR. GUTMAN: Objection; assumes a fact not
11:29:36 25 in evidence, vague and ambiguous.

THIERRY GUETTA

Page 70

11:31:37 1 Q. Now you are?

11:31:38 2 A. I guess.

11:31:40 3 Q. Okay.

11:31:41 4 A. Yes.

11:31:46 5 Q. Without Glen Friedman's photograph of
11:31:52 6 Run DMC, you could have never created the works
11:31:55 7 that we have attached as Exhibit 5; correct?

11:31:56 8 A. That's not true. It just happened to be
11:32:00 9 them photos. Today I wish I -- I -- I didn't have
11:32:03 10 to use them, you know. It's like, you know, it's
11:32:07 11 like -- you know, having a choice and -- and it was
11:32:13 12 like the -- the bad choice, you know. But it could
11:32:20 13 a -- be other people, that's no problem. I could
11:32:22 14 do these photos right now with some other people.

11:32:26 15 Q. Like who?

11:32:26 16 A. Like whatever.

11:32:28 17 Q. Whatever that --

11:32:29 18 A. Whatever that we work, you know? I'm very
11:32:32 19 open and very artistic to make it work with
11:32:36 20 different things. It just happened to be that
11:32:39 21 photo.

11:32:39 22 Q. So if you -- if you used a picture of
11:32:42 23 Milli Vanilli on that -- on that image, do you
11:32:46 24 think it would have sold just as well?

11:32:48 25 A. It didn't sell really well, so, I mean,

THIERRY GUETTA

Page 71

11:32:50 1 the Run DMC didn't do really well at all.

11:32:53 2 It's one of my -- I believe my worst

11:32:56 3 print.

11:32:57 4 Q. Are you embarrassed by that print?

11:32:59 5 A. No.

11:32:59 6 Q. You believe that if you did a photograph

11:33:01 7 of old folks featuring Milli Vanilli instead of Run

11:33:05 8 DMC --

11:33:05 9 A. I don't know --

11:33:05 10 Q. -- that would have made the same artistic

11:33:07 11 statement that you wanted to convey --

11:33:08 12 A. I don't know --

11:33:09 13 (Speaking simultaneously.)

11:33:09 14 MR. GUTMAN: You've got to slow down.

11:33:11 15 THE DEPONENT: Okay.

11:33:11 16 MR. LINDE: Objection; vague, ambiguous,

11:33:12 17 argumentative.

11:33:13 18 And I think also, to clarify, the -- you

11:33:17 19 misinterpreted his response to the prior question.

11:33:20 20 He was talking about using other photographs of

11:33:22 21 Run DMC as opposed to using different rap bands to

11:33:28 22 prove your point. But anyway, I've stated my

11:33:33 23 objection.

11:33:35 24 BY MR. LINDE:

11:33:35 25 Q. Okay. So, as you sit here today, you wish

THIERRY GUETTA

Page 72

11:33:37 1 you would've used a photograph of Run DMC taken by
11:33:40 2 somebody else for your works; correct?

11:33:42 3 A. Yeah. It could be Run DMC, it could be
11:33:44 4 somebody else. It could be another artist or
11:33:47 5 another thing, so, you know, it -- it doesn't
11:33:50 6 matter. I mean, it's not because it was the
11:33:53 7 Run DMC that -- that -- that, you know, it just
11:33:58 8 happens, you know.

11:34:03 9 Q. Okay. And looking at that work that we
11:34:06 10 have attached as Exhibit 4, without Glen Friedman's
11:34:15 11 photograph of Run DMC, you could not have created
11:34:17 12 that work; correct?

11:34:19 13 A. I could have, but it happens that -- that
11:34:24 14 I did it with Run DMC. I mean --

11:34:26 15 Q. And would you --
11:34:27 16 (Speaking simultaneously.)

11:34:27 17 MR. GUTMAN: Let him finish his answer,
11:34:29 18 please.

11:34:29 19 THE DEPONENT: I can -- I can take those
11:34:31 20 two old people and put two other people in the
11:34:34 21 back, and that's it. I could have done it, you
11:34:36 22 know. And it just happened to be Run DMC. It was
11:34:40 23 the wrong choice and the wrong photo. So now, it's
11:34:44 24 like, that's it.

11:34:45 25 ///

THIERRY GUETTA

Page 76

11:37:26 1 Now, do you see like a photo of -- of Glen

11:37:33 2 Friedman? I mean, it's a resemblance, I don't

11:37:37 3 know, you know. It's just an artwork to me.

11:37:39 4 BY MR. LINDE:

11:37:39 5 Q. Without Glen Friedman's Run DMC

11:37:43 6 photograph, you could not have made the work in

11:37:46 7 Exhibit G-39 look the way that it did; correct?

11:37:50 8 MR. GUTMAN: Objection; vague, ambiguous,

11:37:51 9 leading, argumentative, asked and answered.

11:37:55 10 THE DEPONENT: It's just that I choose

11:37:56 11 this image, so this image, you know, it's Glen

11:38:02 12 Friedman's image. It could have been another image

11:38:05 13 of Run DMC. It just happened to be that one.

11:38:07 14 That's all.

11:38:07 15 MR. LINDE: Okay. Can you read back the

11:38:09 16 question.

11:38:10 17 I just want you to listen to the question

11:38:11 18 and just try to answer the question directly.

19 (The record was read as follows:

11:37:39 20 Q. Without Glen Friedman's

11:37:42 21 Run DMC photograph, you could not

11:37:43 22 have made the work in Exhibit

11:37:47 23 G-39 look the way that it did;

11:38:31 24 correct?)

11:38:31 25 MR. GUTMAN: Same objections; asked and

THIERRY GUETTA

Page 85

11:46:02 1 A. Yes.

11:46:02 2 Q. Okay. And do you recall what you -- do
11:46:03 3 you recall the arrangement of the works in the
11:46:05 4 show?

11:46:06 5 A. The arrangement?

11:46:09 6 Q. You did?

11:46:09 7 A. Yes, I do.

11:46:10 8 Q. Okay. And you recall that you hung the
11:46:12 9 Run DMC canvas at your show; correct?

11:46:14 10 A. Yes, I did.

11:46:15 11 Q. Okay. And is that location above the
11:46:16 12 Miles Davis photo -- work, approximately where you
11:46:20 13 hung the Run DMC canvas?

11:46:23 14 A. On that photo, yes.

11:46:24 15 Q. Okay. And so do you believe that the --
11:46:25 16 the image of Run DMC that is depicted on pages 2
11:46:29 17 and 3 of Exhibit 7 are, in fact, the Run DMC canvas
11:46:32 18 that is featured on page 1 of Exhibit 7, which is
11:46:37 19 G-41?

11:46:38 20 A. Yes.

11:46:39 21 Q. Okay. Turning then to the fourth page of
11:46:45 22 Exhibit 7.

11:46:46 23 Do you see that?

11:46:46 24 A. Yes.

11:46:47 25 Q. Okay. And that's a picture of your

THIERRY GUETTA

Page 86

11:46:49 1 office; correct?

11:46:50 2 A. Yes.

11:46:50 3 Q. Okay. And there's another picture of
11:46:52 4 Run DMC there.

11:46:53 5 Do you see that?

11:46:53 6 A. Yes. It's the same one?

11:46:56 7 Q. You believe that to be the same canvas?

11:46:58 8 A. Yes.

11:46:58 9 Q. Okay. So when we talk about the -- is
11:47:00 10 that the same Run DMC canvas in each of the
11:47:03 11 pictures in Exhibit 7?

11:47:04 12 A. Exhibit 7?

11:47:07 13 Oh, yes. The same one.

11:47:09 14 Q. Okay. Did you -- actually, strike the
11:47:13 15 question and start over.

11:47:14 16 How is this Run DMC canvas created?

11:47:17 17 A. Same way as the other one, projecting and
11:47:19 18 paint.

11:47:20 19 Q. And what kind of paint?

11:47:22 20 A. Acrylic black paint.

11:47:28 21 Q. And how is it applied?

11:47:30 22 A. What do you mean?

11:47:30 23 Q. How is it applied to the canvas?

11:47:34 24 A. Just with a brush and you paint it.

11:47:36 25 Q. And did you personally do that?

THIERRY GUETTA

Page 88

11:49:04 1 another photo of the Run DMC, and it could be the
11:49:07 2 same way to me, you know.

11:49:10 3 BY MR. LINDE:

11:49:10 4 Q. Who contributed more to the look of the
11:49:13 5 Run DMC canvas, you or Glen Friedman?

11:49:16 6 MR. GUTMAN: Objection; vague, ambiguous.

11:49:18 7 THE DEPONENT: It's -- it's just the
11:49:21 8 photos now, that Glen Friedman, and this is a
11:49:24 9 painting. This is a different things. You know,
11:49:27 10 it's just two different things. It's not -- I -- I
11:49:30 11 don't -- I didn't made a photo of his photos. It's
11:49:36 12 just a painting of a photo. That's what it is.

11:49:39 13 BY MR. LINDE:

11:49:40 14 Q. And okay. And so the --

11:49:41 15 A. So that -- I mean, it doesn't look like a
11:49:43 16 photo. You know, it's a painting.

11:49:44 17 Q. And so your Run DMC canvas is a painting
11:49:50 18 of Glen Friedman's Run DMC's photo; correct?

11:49:53 19 A. Yes, it is.

11:49:54 20 Q. Okay. And as you sit here today, do you
11:49:59 21 believe that you should compensate Mr. Friedman for
11:50:05 22 your use of his Run DMC photo?

11:50:08 23 MR. GUTMAN: Objection; calls for a legal
11:50:09 24 conclusion, and I also instruct you not to respond
11:50:12 25 to the question to the extent that any information

THIERRY GUETTA

Page 94

11:56:43 1 conclusion. And I'd also instruct the witness not
11:56:45 2 to respond to the extent it calls upon
11:56:49 3 attorney-client privileged communications.

11:56:51 4 BY MR. LINDE:

11:56:51 5 Q. Were you trying to make a joke about
11:56:54 6 Run DMC through your work?

11:56:55 7 A. Not at all.

11:56:55 8 Q. In making the Run DMC old -- in making the
11:57:10 9 Run DMC canvas --

11:57:15 10 A. Yes.

11:57:16 11 Q. -- were you trying to offer your personal
11:57:22 12 opinions on Glen Friedman?

11:57:23 13 A. I didn't know who was Glen Friedman at the
11:57:29 14 time when I was working in this photo.

11:57:30 15 Q. When you were making the Run DMC canvas,
11:57:35 16 were you trying to offer your personal opinions as
11:57:37 17 to Run DMC?

11:57:38 18 A. Personal opinion? It was this for me
11:57:50 19 something artistic that I create, that's all. I
11:57:54 20 didn't -- you know, I don't think when I do
11:57:55 21 something, you know, there is not a back -- back
11:57:59 22 thinking of something. I do it because I feel like
11:58:03 23 doing it.

11:58:04 24 Q. Okay. So when you were creating the
11:58:06 25 Run DMC canvas, were you trying to express an

THIERRY GUETTA

Page 95

11:58:08 1 opinion?

11:58:08 2 A. Not really.

11:58:09 3 Q. When you --

11:58:10 4 A. You know, I mean, I -- I kind of wanted to

11:58:14 5 do something and -- and the image was there. Like

11:58:17 6 I said, I used it for the old people, and -- and I

11:58:21 7 said I should paint it, and that's what I did.

11:58:24 8 Q. When you created the Run DMC out of

11:58:28 9 records, were you trying to express an opinion?

11:58:30 10 A. No.

11:58:30 11 Q. When you created the Run DMC Old Family,

11:58:33 12 were you trying to create -- were you trying to

11:58:35 13 express an opinion?

11:58:36 14 A. No.

11:58:41 15 Q. Okay. Let's talk a little bit about the

11:58:44 16 print.

11:58:44 17 There's one of these Run DMC images that

11:58:47 18 you made into a limited edition print; correct?

11:58:50 19 A. Yes.

11:58:51 20 MR. GUTMAN: Well, the image is not a

11:58:55 21 Run DMC image. It's what's been marked as

11:58:57 22 Exhibit 4, I think.

11:59:00 23 THE DEPONENT: It's a mix.

11:59:07 24 Hello, hello.

11:59:33 25 MR. LINDE: All right. Exhibit 8, I'm

THIERRY GUETTA

Page 102

12:05:24 1 A. I don't recall if she work as an employee.

12:05:31 2 I think an employee. I think --

12:05:32 3 MR. GUTMAN: Don't guess. Just --

12:05:34 4 THE DEPONENT: Yeah. I -- I -- I'm not
12:05:35 5 sure.

12:05:35 6 BY MR. LINDE:

12:05:35 7 Q. Okay. Let me ask you this way: Does she
12:05:37 8 actually work in your office, or when you want her
12:05:40 9 to print something, do you have to go to her?

12:05:43 10 A. She works in my -- my -- my -- not my
12:05:47 11 office. Because, you know, but she work a part in
12:05:52 12 the -- of one of the -- of the same building where
12:05:55 13 I am.

12:05:57 14 Q. And do you know the name -- the name of
12:05:59 15 the art -- of the store where you generally buy the
12:06:01 16 paper that --

12:06:03 17 A. It's somewhere here in Los Angeles.

12:06:04 18 Q. Do you know the name of it?

12:06:05 19 A. No.

12:06:12 20 Q. Okay. And you advertised this Run DMC Old
12:06:23 21 Family print as a limited edition of 300; correct?

12:06:25 22 A. Yes.

12:06:26 23 Q. And through discovery -- actually, strike
12:06:55 24 the question. Start over.

12:06:56 25 You've sold 62 of these prints to date; is

THIERRY GUETTA

Page 103

12:07:05 1 that right?

12:07:05 2 A. I guess so.

12:07:07 3 MR. GUTMAN: Don't guess. If you know --

12:07:11 4 THE DEPONENT: No, I don't -- I don't -- I
12:07:12 5 don't know.

6 MR. GUTMAN: Okay.

12:07:12 7 THE DEPONENT: I don't know.

12:07:12 8 BY MR. LINDE:

12:07:14 9 Q. Is there somebody who does the accounting
12:07:17 10 for you?

12:07:18 11 A. Today, yes.

12:07:20 12 Q. Who?

12:07:21 13 A. My brother.

12:07:22 14 Q. And was there somebody who did accounting
12:07:26 15 for you before your brother?

12:07:28 16 A. My wife.

12:07:29 17 Q. And just be clear, did your wife do
12:07:34 18 accounting for you while you were selling art
12:07:38 19 prints?

12:07:39 20 A. At the time I -- you know, at that time,
12:07:44 21 the time of Run DMC prints, it was the beginning
12:07:49 22 of -- of us making prints, so we didn't really know
12:07:54 23 as well as we do today.

12:07:56 24 Q. Who did the accounting for you at that
12:07:59 25 time?

THIERRY GUETTA

Page 104

12:07:59 1 A. I -- I don't recall.

12:08:06 2 Like I said, I'm an artist, and -- and I
12:08:07 3 don't think.

12:08:09 4 Q. When you -- okay.

12:08:10 5 So you advertised the Run DMC print,
12:08:14 6 Run DMC Old Family print as the limited edition of
12:08:17 7 300; correct?

12:08:17 8 A. Yes.

12:08:18 9 Q. Okay. And after you made it, you believe
12:08:21 10 you washed the screen; correct?

12:08:22 11 A. I guess so.

12:08:24 12 Q. Okay.

12:08:24 13 A. I'm not sure. I mean, I don't recall.
12:08:26 14 Normally, that's the process of.

12:08:29 15 Q. You certainly don't recall printing a
12:08:33 16 second run of Run DMC Old Family prints; correct?

12:08:36 17 A. I guess this -- this person who works,
12:08:40 18 Celeste, she kind of -- she kind of keep track, and
12:08:44 19 that's how they got the information of how many
12:08:46 20 print is being done.

12:08:48 21 MR. GUTMAN: The question was: You don't
12:08:50 22 recall there being a second run of printing?

12:08:52 23 THE DEPONENT: Oh, I -- I don't think it
24 was.

12:08:54 25 ///

THIERRY GUETTA

Page 105

12:08:54 1 BY MR. LINDE:

12:08:57 2 Q. And you believe that when you first
12:08:59 3 printed the Run DMC Old Family print, you, in fact,
12:09:03 4 printed 300 of them; correct?

12:09:05 5 A. No. We didn't print 300.

12:09:06 6 Q. How many did you print?

12:09:08 7 A. If looking on the -- on the -- on the --
12:09:12 8 because I don't keep track at that moment how many
12:09:15 9 print. Like I said, we were just starting -- that
12:09:19 10 was my first show in Los Angeles when we start
12:09:22 11 making print, and we made that print, and somewhere
12:09:25 12 we made it an -- an addition of 300.

12:09:29 13 But at that time we were not selling, you
12:09:33 14 know. We were not selling as, you know, like a --
12:09:36 15 it -- it's like you wouldn't do a print and sell
12:09:39 16 300 already. It was a -- a -- a kind of a -- a
12:09:42 17 large edition kind of way for that -- for what it
12:09:49 18 was. So -- so we decide, like -- like you say,
12:09:51 19 for -- for the paper and -- and we're not sure,
12:09:55 20 we're not like a big company at this moment at all.
12:10:00 21 And -- and we print, I guess, half of it.

12:10:06 22 Q. So you think you printed 150?

12:10:09 23 A. I believe so.

12:10:10 24 Q. Okay. Every one of the Run DMC Old Family
12:10:14 25 prints that you sell is signed and serial numbered;

THIERRY GUETTA

Page 106

12:10:18 1 correct?

12:10:18 2 A. Yes.

12:10:27 3 Q. Do you keep a master listing of the serial
12:10:30 4 numbers of the Run DMC prints that you sold?

12:10:36 5 A. At that time, we were not so well
12:10:37 6 organized at that time. You know, it was like the
12:10:39 7 beginning, like I said. So I don't know, you know.
12:10:44 8 I cannot know for sure the -- the -- the thing
12:10:50 9 happens.

12:10:50 10 But I can say that we did 150, but we
12:10:56 11 might did the number from -- from 200 to 250, and
12:11:02 12 from 100, 200 and -- to 100 and, you know. I -- I
12:11:09 13 don't know.

12:11:09 14 But I know that when I was doing the
12:11:14 15 edition at that time, I was making like, in a way,
12:11:18 16 not starting from 1 to 150. I would take different
12:11:23 17 way of making it different numbers. You know, like
12:11:28 18 because, you know, it's -- it was the beginning,
12:11:31 19 and -- and I felt like -- like -- like -- like
12:11:37 20 selling from 1 to 150. And if I didn't sell it, I
12:11:41 21 feel like a fool. And if I would sell from 150
12:11:46 22 or -- or 200 or -- to 300 or, you know, some
12:11:51 23 numbers, I would make different confusing number to
12:11:55 24 look -- to look -- look different.

12:11:59 25 And I believe that I thought I was going

THIERRY GUETTA

Page 111

12:15:50 1 BY MR. LINDE:

12:15:50 2 Q. How did you --

12:15:50 3 A. Like I -- like I say, it's not me who is
12:15:53 4 taking care of it. And you never had the problem
12:15:55 5 for me to put back a number, because I never used
12:15:58 6 this image again.

12:15:59 7 Q. Who took care of it?

12:16:01 8 A. I have no idea.

12:16:02 9 Q. How did you know that with respect to the
12:16:07 10 Run DMC Old Family prints you didn't sell two
12:16:10 11 prints with the same number?

12:16:12 12 A. I don't know. It might still happen, an
12:16:15 13 accident. Like I say, it's the beginning. It was
12:16:17 14 the beginning, and I don't know.

12:16:18 15 Q. Okay. So, as you sit here today --

12:16:20 16 A. Now, it doesn't -- I'm not going to say
12:16:21 17 "no," because I don't know.

12:16:24 18 Q. So as you sit here today, do you think
12:16:25 19 it's possible that you could have sold two Run DMC
12:16:29 20 Old Family prints with the same serial number?

12:16:30 21 A. It could be possible. No problem.

12:16:34 22 Accident happens.

12:16:36 23 Q. Do you know the website Inside the Rock
12:16:40 24 Poster Frame?

12:16:40 25 A. No, I don't.

THIERRY GUETTA

Page 122

12:26:08 1 MR. LINDE: Right. And I'm touching them,
12:26:08 2 just like you just touched them when you put them
12:26:11 3 down on the table.

12:26:12 4 MR. GUTMAN: I understood that. I just
12:26:12 5 want to make sure that they go back into the stack.

12:26:15 6 MR. LINDE: So do I.

12:26:19 7 MR. GUTMAN: What are you looking for?

12:26:25 8 MR. LINDE: Just putting these in order.

12:26:27 9 BY MR. LINDE:

12:26:27 10 Q. Okay. So the item that's sold -- this
12:26:29 11 sale as reflected in Exhibit 11 --

12:26:32 12 A. Yeah.

12:26:32 13 Q. -- is the canvas that we have depicted in
12:26:35 14 Exhibit 7; correct?

12:26:36 15 A. Yes.

16 Q. Okay.

12:26:41 17 A. Now, with the invoice, I'm not sure, you
12:26:43 18 know, if some people that are working for me
12:26:46 19 supplies you this -- this money, you know, I -- I
12:26:49 20 have no idea.

12:26:49 21 Q. What do you mean by that?

12:26:50 22 A. I don't know.

12:26:52 23 Q. You don't know what?

12:26:52 24 A. I don't know the money and things. Like I
12:26:55 25 say, I'm an artist.

THIERRY GUETTA

Page 123

12:26:56 1 Q. Okay. So there's a certain price that's
12:26:58 2 indicated on there, you don't know if that's
12:27:00 3 correct --

4 A. Yeah.

12:27:00 5 Q. -- is that what you're trying to say?

12:27:02 6 A. I guess so. But it looks like it says
12:27:05 7 "Run DMC painting, 14,000." That's what it should
12:27:07 8 be.

12:27:07 9 Q. Okay. And you believe that that refers to
12:27:09 10 the canvas?

12:27:10 11 A. Yes.

12:27:11 12 Q. Okay. I want to try to establish the
12:27:14 13 total number of large pieces bearing the Friedman
12:27:24 14 Run DMC photo that you made. Okay?

12:27:26 15 A. Yes.

12:27:28 16 Q. Okay.

12:27:28 17 MR. GUTMAN: Well, you are saying bearing
12:27:29 18 the Friedman photo. There are no pieces that bear
12:27:32 19 the Friedman photo.

12:27:33 20 MR. LINDE: Incorporate it. Oh, let's go
12:27:38 21 off the record.

12:27:38 22 THE VIDEOGRAPHER: This is the end of
12:27:39 23 Tape 2 of the deposition of Thierry Guetta, and we
12:27:45 24 are now going off the record, and the time is
12:27:47 25 approximately 12:27 p.m.

THIERRY GUETTA

Page 124

12:27:50 1 (Whereupon, a recess was held
12:27:51 2 from 12:27 p.m. to 12:35 p.m.)
12:28:46 3 THE VIDEOGRAPHER: We are now going back
12:35:17 4 on the record, and the time is approximately
12:35:19 5 12:35 p.m.
12:35:22 6 BY MR. LINDE:
12:35:23 7 Q. Okay. I want to establish the total
12:35:25 8 number of one-off pieces that you made
12:35:31 9 incorporating the Friedman Run DMC image.
12:35:35 10 Do you understand what I mean by that?
12:35:36 11 A. Can you repeat that?
12:35:39 12 Q. Sure. You make certain works that are 1
12:35:43 13 of 1; right?
12:35:44 14 A. Yes.
12:35:44 15 Q. Okay. And do you have a name for that?
12:35:48 16 Do you call those fine art pieces or do you have
12:35:51 17 a --
12:35:51 18 A. It's just a painting.
12:35:52 19 Q. 1 of 1s?
12:35:53 20 A. It could be 1 of 1s, if it's only one,
12:35:54 21 yes.
12:35:55 22 Q. Is there a --
12:35:58 23 A. There's -- is like some painting, you call
12:36:00 24 it -- you don't call the painting this is 1 of 1,
12:36:03 25 you know. It's just 1.

THIERRY GUETTA

Page 125

12:36:04 1 Q. You call it a painting?

12:36:06 2 A. A painting, yeah.

12:36:07 3 Q. Okay. Is there any other name that you
12:36:08 4 would use for that, or is "painting" the name?

12:36:11 5 A. Just a painting. Might be 1 of 1. If
12:36:13 6 it's -- if it's one, you -- you know.

12:36:17 7 Q. For example, the records series that you
12:36:22 8 do are not paintings; correct?

12:36:27 9 MR. GUTMAN: What do you mean, "series"?

12:36:32 10 MR. LINDE: He has a series of --

11 MR. GUTMAN: Oh.

12:36:34 12 MR. LINDE: -- artists that have records.

12:36:36 13 THE DEPONENT: Yes. It's a painting done,
12:36:38 14 and it's covered with records, and it's one of a
12:36:43 15 kind.

12:36:44 16 BY MR. LINDE:

12:36:44 17 Q. Okay. Maybe one of a kind, is that a fair
12:36:48 18 word?

12:36:49 19 A. Yes.

12:36:49 20 Q. So I want to establish the total number
12:36:51 21 of one-of-a-kinds that you did incorporating the
12:36:54 22 Friedman Run DMC photo. Okay?

12:36:56 23 A. Yes.

12:36:56 24 Q. Okay. So, the -- the first one that we
12:37:10 25 will discuss is the aforementioned records. And

THIERRY GUETTA

Page 126

12:37:15 1 I'm going to mark that as Exhibit 12. Let's see
10:13:09 2 here.

10:13:10 3 (Whereupon, Plaintiff's Exhibit No. 12
4 was marked for identification by the
5 deposition officer and is attached
12:37:18 6 hereto.)

12:37:25 7 THE DEPONENT: Okay.

12:37:26 8 MR. LINDE: Take a look at that.

12:37:29 9 THE DEPONENT: Okay.

10 (Document placed before the deponent.)

12:37:41 11 (Deponent reviewed document.)

12:37:41 12 THE DEPONENT: Boom, boom, boom.

12:37:47 13 (Humming.)

12:37:47 14 Yes.

12:37:48 15 BY MR. LINDE:

12:37:48 16 Q. Okay. And you recognize pages 2 and 3 of
12:37:57 17 that exhibit as the Run DMC records work on display
12:38:02 18 at your Los Angeles -- Los Angeles show?

12:38:04 19 A. Yes, I do.

12:38:06 20 Q. Okay. And at some point in time, was
12:38:08 21 there a "No Smoking" sign that was put on that
12:38:12 22 Run DMC records?

12:38:13 23 A. I just don't recall, you know. I mean,
12:38:17 24 that's may be these photos. I see on the first
12:38:20 25 photos, they were not -- some not smoking. The

THIERRY GUETTA

Page 127

12:38:25 1 second one, not. And the third one was. So maybe

12:38:28 2 somebody put it there. I don't -- I don't recall.

12:38:32 3 Q. But as far as it -- it's all the same,

12:38:35 4 there's only one of these; correct?

12:38:36 5 A. Yeah. Only one. That is the same --

12:38:40 6 same -- same pieces of art.

12:38:42 7 Q. Okay. So we will call that one the

12:38:44 8 Run DMC records.

12:38:45 9 A. Exactly.

12:38:45 10 Q. Okay. And then we previously marked, I

12:39:16 11 believe, as Exhibit 7, the Run DMC canvas?

12:39:22 12 A. Which one? 7?

12:39:24 13 Q. 7.

12:39:26 14 A. This is 37?

12:39:27 15 Q. 7. Exhibit 7.

16 MR. GUTMAN: Let me see if I can help.

12:39:35 17 THE DEPONENT: 7. I don't know. This one

12:39:35 18 is 7?

12:39:36 19 MR. GUTMAN: Yeah, that looks like 7.

12:39:38 20 THE DEPONENT: Okay. Yeah, that's a

12:39:38 21 painting, yeah.

12:39:39 22 BY MR. LINDE:

12:39:40 23 Q. Run DMC canvas?

12:39:41 24 A. Yes.

12:39:50 25 MR. LINDE: I'm going to mark as

THIERRY GUETTA

Page 128

12:39:51 1 Exhibit 13.

12:39:55 2 (Whereupon, Plaintiff's Exhibit No. 13
3 was marked for identification by the
4 deposition officer and is attached
12:40:02 5 hereto.)

12:40:02 6 THE DEPONENT: 13. This is this?

12:40:08 7 BY MR. LINDE:

12:40:08 8 Q. Correct. This is another copy of it.

12:40:10 9 A. Okay. Okay.

12:40:19 10 Q. Do you recognize that?

12:40:20 11 A. Yes, I do.

12:40:20 12 Q. And that's a work that you had -- a work
12:40:24 13 of Run DMC behind -- can we call it fluorescent
12:40:30 14 graffiti, that you had on display at your show?

12:40:34 15 A. Yes.

12:40:34 16 Q. And if we call that one the Run DMC
12:40:40 17 fluorescent graffiti, is that a -- a fair term to
12:40:42 18 call it?

12:40:42 19 A. Sure.

12:40:43 20 Q. And that was on display at the Los Angeles
12:40:45 21 show?

12:40:45 22 A. Yes.

12:40:46 23 And each one of these painting that you
12:40:48 24 show me, each one of them is different. This is a
12:40:50 25 stencil. The one previously was a painting. And

THIERRY GUETTA

Page 156

13:08:14 1 well, any -- any of the artwork that had the
13:08:16 2 Run DMC image or any part of Run DMC image, was it
13:08:20 3 offered for sale to the public, the works that were
13:08:22 4 showed at the L.A. show?

13:08:24 5 THE DEPONENT: I don't recall if they
13:08:25 6 were. But I know that the print was and the -- the
13:08:30 7 original like the Records and everything, it's --
13:08:32 8 it wasn't -- it wasn't any price of it.

13:08:35 9 BY MR. LINDE:

13:08:35 10 Q. Okay.

13:08:35 11 A. I'm not sure of it.

13:08:36 12 Q. Exhibit 12 is the Records. Do you see
13:08:38 13 that?

13:08:38 14 A. Which one? This one? Uh-huh.

13:08:40 15 Q. And that was on display at the Los Angeles
13:08:43 16 show; correct?

13:08:43 17 A. Yes.

13:08:43 18 Q. And if somebody came to the Los Angeles
13:08:46 19 show and they wanted to buy it from you, was that
13:08:48 20 for sale?

13:08:48 21 A. I don't recall if it was.

13:08:51 22 Q. Would have you sold it?

13:08:53 23 A. I didn't sell it.

13:08:54 24 Q. Would you have sold it if you were offered
13:08:56 25 money -- enough money for it?

THIERRY GUETTA

Page 157

13:08:58 1 MR. GUTMAN: What's the question? Would
13:08:58 2 he have sold it?

13:08:59 3 MR. LINDE: Correct.

13:08:59 4 MR. GUTMAN: No foundation, incomplete
13:09:01 5 hypothetical, calls for speculation.

13:09:03 6 THE DEPONENT: No. I -- I don't know. I
13:09:07 7 don't recall, you know. It was more like a making
13:09:08 8 a statement of an artist, an artistic movement.

13:09:13 9 BY MR. LINDE:

13:09:13 10 Q. Were any of -- did you sell any of the
13:09:16 11 records works at the Los Angeles show?

13:09:19 12 A. I don't recall.

13:09:20 13 Q. Exhibit 13 is what we call the fluorescent
13:09:30 14 graffiti.

13:09:31 15 A. Yes.

13:09:33 16 Q. Was that for sale at the Los Angeles show?

13:09:35 17 A. I don't recall.

13:09:38 18 It was more like a statement of a show --

13:09:41 19 MR. GUTMAN: You've answered the question.

13:09:42 20 THE DEPONENT: Okay.

13:09:42 21 BY MR. LINDE:

13:09:42 22 Q. At the Los Angeles show, it was your hope
13:09:44 23 to sell works on display; correct?

13:09:46 24 A. I guess, yeah.

13:09:50 25 Q. And when you -- and you did, in fact, sell

THIERRY GUETTA

Page 158

13:09:53 1 certain works; correct?

13:09:54 2 A. I guess, yeah. Yeah.

13:09:58 3 Q. And that money went to you; correct?

13:10:00 4 A. Yes.

13:10:02 5 Q. Okay. The money wasn't going to nonprofit
13:10:05 6 educational purposes; correct?

13:10:07 7 MR. GUTMAN: Are you being facetious, or
13:10:08 8 are you asking about something specific?

13:10:10 9 MR. LINDE: I'm asking about -- I asked my
13:10:12 10 question.

13:10:12 11 THE DEPONENT: I don't recall.

13:10:13 12 BY MR. LINDE:

13:10:13 13 Q. Okay. So, as you sit here today, you have
13:10:16 14 no knowledge that the money from the sale of art at
13:10:21 15 your show went to nonprofit educational purposes;
13:10:25 16 correct?

13:10:25 17 A. I don't recall.

13:10:25 18 Q. The intended audience for the -- for your
13:10:34 19 Run DMC works are people who are interested in the
13:10:36 20 group Run DMC and want something to look at or hang
13:10:39 21 on their wall; correct?

13:10:40 22 A. I guess.

13:10:42 23 MR. GUTMAN: Objection; vague and
13:10:44 24 ambiguous.

13:10:44 25 Don't -- don't guess.

THIERRY GUETTA

Page 167

13:18:22 1 THE DEPONENT: Promote that show --

2 MR. GUTMAN: -- how did you get the word

3 out --

4 (Speaking simultaneously.)

13:18:23 5 THE DEPONENT: I -- I did some art. I

13:18:24 6 kind of -- I kind of give the word that I was

13:18:33 7 having a show. Like I said, I did some street art

13:18:35 8 and -- and I don't recall everything. But at that

13:18:39 9 moment, you know, it was like working and day by

13:18:44 10 day, every day, you know, long days, and that's it.

13:18:48 11 BY MR. LINDE:

13:18:49 12 Q. Okay. So is it fair to say that, as you

13:18:51 13 sit here today, the only two things that you can

13:18:52 14 recall doing for promotion for the Los Angeles show

13:18:55 15 were street art and postcards?

13:18:58 16 A. No. I -- I did street art, postcards, I

13:19:02 17 did a show. I got picked up from "L.A. Weekly."

13:19:07 18 They thought it was incredible what I was doing, so

13:19:10 19 they put me on front page of "L.A. Weekly." I got

13:19:13 20 picked up from, I believe, "Los Angeles Time." I

13:19:17 21 got picked up -- you know, I came up with something

13:19:19 22 that -- that was kind of different in Los Angeles

13:19:23 23 and big.

13:19:25 24 Q. Anything else that you can think of,

13:19:26 25 specifically?

THIERRY GUETTA

Page 168

13:19:26 1 A. I rent a space in one of the first motion
13:19:31 2 pictures of Los Angeles building, 1911, that was
13:19:37 3 C.B.S., that was abandoned for the last year that
13:19:41 4 I just put in shape. And it took me two or three
13:19:44 5 months to make it happen, you know.

13:19:47 6 Q. Anything else that you can think of,
13:19:49 7 specifically?

13:19:49 8 A. I have -- no, I don't recall. You know, I
13:19:54 9 don't recall. A lot of thing happens at that time.

13:19:57 10 Q. And you created the postcards in order to
13:20:00 11 help create excitement for the show?

13:20:02 12 A. No, to trying to give something that I've
13:20:04 13 done, you know. To give something for free.

13:20:07 14 Q. And that was to get your fans excited?

13:20:11 15 A. No. To -- to -- to just to be -- to be --
13:20:21 16 to be able to -- to -- to give something, you know.
13:20:25 17 To give something about this -- this moment.

13:20:35 18 You know, you don't do like 50 or 30 or
13:20:37 19 40 different postcards, print it, and give it to
13:20:42 20 people, you know. I mean, it's -- it's not what
13:20:44 21 you see in a show.

13:20:45 22 I was trying to -- to make a statement,
13:20:49 23 you know. Art, it's about not just making, but
13:20:53 24 giving.

13:21:00 25 Q. Okay.